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Remarks

Claims 1-28 are pending in the application.

I. CLAIM OBJECTIONS

Claim 23 is objected to for having a typographical error "a destination coordinate set extant in the received message." The official action indicates that the Examiner interprets "set extent" as "set extent." The applicants respectfully traverse the objection and respectfully submit that the original is correct. MERRIAM-WEBSTER ONLINE <http://www.m-w.com/cgi-bin> defines "extant" as "currently or actually existing," which is the sense in which the word is used in the claim. The applicants respectfully request that the objection be withdrawn.

II. DOUBLE PATENTING

Claims 1-28 are provisionally rejected under the judicially created doctrine of double patenting over claims 1-27 of copending United States patent application serial no. 09/915,934 (the '934 *application*). The applicants respectfully traverse the rejection on the grounds that the official action does not set forth a *prima facie* case of lack of patentable distinctiveness. The official action simply highlights some common wording between one claim (Claim 1) of the '934 application and one claim (Claim 15) of the present application. The applicants respectfully note that the claims of the present application are structural claims and computer-readable medium claims and those of the '934 application are method claims and as such recite different limitations from the structural claims and computer-readable medium claims of the present application. As further evidence of the distinctiveness between the present application and the '934 application, the applicants respectfully point out that none of the references over which the claims in the '934 application were rejected in official actions issued by Examiner Vu were used to reject the claims of the present application.

Moreover, the official action does not indicate a correspondence between the claims of the present application and the claims of the '934 application: there are 28 in

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the former and 27 in the latter, so a 1:1 correspondence between the claims cannot be assumed.

The applicants respectfully submit that the double patenting rejection is improper and respectfully request that it be withdrawn.

III. CLAIM REJECTIONS UNDER 35 USC § 102(e)

Claims 1-28 rejected under 35 USC § 102(e) as anticipated by United States patent no. 5,845,203 of LaDue, cited in the official action as "LeDuc et al." References in this response to United States patent no. 5,845,203, including quotations from the official action, will refer to the patentee as stated in the patent, i.e., LaDue. The applicants respectfully traverse the rejection of Claims 1-28 on the grounds that LaDue does not disclose all the claim limitations set forth in the respective claims.

Claim 1

The official action states that the subject matter recited in Claim 1 is disclosed by the description of "a topographical coordination systems that provide location data to service processing system included network addresses." at col. 16, lines 1-46 of LaDue's disclosure. The applicants respectfully disagree.

The applicants respectfully note that col. 16, lines 30-32 of LaDue's disclosure states as follows: "topographical coordination systems that provide location data to bearer service processing centers." The applicants have been unable to find anything in the cited passage of LaDue's disclosure that teaches or suggests that this location data is used as a network address or is in any way related to a network address. LaDue appears to indicate that such location information is sent as the payload of a message addressed using conventional addressing. LaDue states that such messages are sent "by sending data packets over a service control point 120 of a conventional SS7 network using SS7 addresses or by T1/DSO signalling protocols via a PSTN." (col. 16, lines 33-38)

The applicants have been unable to find anything in the cited passage of LaDue's disclosure that teaches or suggests a network comprising topographic network devices.

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each having a network address that includes a topographic coordinate set representing the physical location of the network device. Accordingly, the applicants respectfully submit that LaDue does not disclose every element recited Claim 1, and that the rejection of Claim 1 is therefore improper. The applicants further submit that the rejections of Claims 2-14 that depend on Claim 1 are also improper at least for the reason of these claims' dependency of Claim 1.

B. Claim 2

The official action states that the subject matter recited in Claim 2 is disclosed by the description of "GPS" at col. 7, lines 41-63 of LaDue's disclosure. The applicants respectfully disagree. At col. 7, lines 49-54 in the cited passage of LaDue's disclosure, LaDue states: "a plurality of application specific facilitator bearer service providers (FAC) 120 communicatively linked to a plurality of global positioning Navstar satellites (GPS) 112, Inmarsat P satellites 114, and cell broadcast transmitters located at and integral to the base site." Notwithstanding the explicit mention of GPS satellites in the quoted passage, the applicants have been unable to find anything in the cited passage or elsewhere in LaDue's disclosure that discloses a GPS receiver connected to a topographic network device to supply to such topographic network device the topographic coordinate set thereof. Moreover, the applicants have been unable to find anything in the cited passage of LaDue's disclosure that teaches or suggests that anything is done with GPS data other than transmitting it through a conventional network using LaDue's CCAD protocol. Accordingly, the applicants respectfully submit that LaDue does not disclose every element recited Claim 2, and that the rejection of Claim 2 is therefore improper.

C. Claim 5

The official action states that the subject matter recited in Claim 5 is disclosed by the description of "a topographical coordination systems that provide location data to service processing system included network addresses via Internet" at col. 16, lines 1-16 of LaDue's disclosure. The applicants respectfully disagree. The cited passage of LaDue's

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disclosure is discussed above with reference to Claim 1. The applicants have been unable to find anything in the cited passage that could accurately be said to disclose the "topographical addressing engine" recited in Claim 5. As noted above, LaDue indicates that the messages transmitted using his CCAD protocol are conventionally addressed.

The applicants respectfully submit that the location information referred to by LaDue is location information relating to the originating device, not to a destination device. A central monitoring system to which LaDue's location information relates would be useless if the location information transmitted was that of the destination device rather than that of the originating device. The destination device wants to know the location of the originating device. Accordingly, the applicants respectfully submit that LaDue cannot accurately be said to disclose "topographic network devices capable of originating the message for transmittal through the network to another of the topographic network devices as a destination network device each include a topographic addressing engine that operates to include the topographic coordinate set of the destination network device in the message," as recited in Claim 5. Accordingly, the applicants respectfully submit that LaDue does not disclose every element recited Claim 5, and that the rejection of Claim 5 is therefore improper.

D. *Claim 6*

The official action states that the subject matter recited in Claim 6 is disclosed by the description of "routing via the nearest SS7 signal transfer point" at col. 14, lines 16-62 of LaDue's disclosure. The applicants respectfully disagree. For reasons similar to those set forth above with reference to Claim 5, the applicants respectfully submit that LaDue cannot accurately be said to disclose "the message includes the topographic coordinate set of a destination network device as a destination coordinate set, the destination network device being one of the topographic network devices," as recited in Claim 6. Such location data as is included in the messages transmitted using LaDue's CCAD protocol relates to the source device.

The applicants note that the cited passage of LaDue's disclosure discloses

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message conversion and conventional SS7 routing at the MSC. The applicants have been unable to find anything in the cited passage that teaches or suggests that such message routing is performed in response to the location data possibly included in the message. The applicants have been unable to find anything in the cited passage of LaDue's disclosure that indicates that any of LaDue's H words can include GPS data. Moreover, the applicants have been unable to find anything in the cited passage that teaches or suggests that the conversion and routing process described by LaDue routes the message to another device that is physically closer to the message's destination than the MSC. As noted in paragraph 0004 of the background section of the application, in conventional message routing, there is no guarantee that the network device to which the message is routed is any closer to the message's destination than the network device doing the routing. Accordingly, the applicants respectfully submit that LaDue cannot accurately be said to disclose "a one of the topographic network devices as an intermediate network device, upon receiving the message, operates to route the message to another of the topographic network devices, the other of the network devices being physically closer to the destination network device than the intermediate topographic network device," as recited in Claim 6. Accordingly, the applicants respectfully submit that LaDue does not disclose every element recited Claim 6, and that the rejection of Claim 6 is therefore improper.

Claim 7

The official action states that topographic network devices having substantially coincident physical locations each include an additional numeric data field as inherent features of topographic coordination systems. The applicants are not aware of this feature and respectfully request the Examiner to provide a reference in which inherent feature is disclosed. If the statement of inherency is based on the Examiner's personal knowledge, the applicants respectfully request that the Examiner provide an affidavit to this effect (MPEP § 2144.03). The applicants respectfully submit that LaDue cannot accurately be said to disclose, explicitly or implicitly, every element recited in Claim 7, and that the

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rejection of Claim 7 is therefore improper.

Claim 8

The official action states that the subject matter recited in Claim 8 is disclosed by the description of "monitoring, identifying, specifying communication device" at col. 20, line 47-col. 21, line 17 of LaDue's disclosure. The applicants respectfully disagree. As stated above with respect to Claim 1, the applicants respectfully submit that LaDue cannot accurately be said to disclose topographic network devices. The applicants have been unable to find mention of a "monitoring" operation in the cited passage. A central monitoring device and a central monitoring station are mentioned, but not the monitoring operation referred to in the official action. Additionally, the relevance of "monitoring" to the subject matter recited in Claim 8 is unclear to the applicants.

The applicants have been unable to find any disclosure of topographic network devices in the cited passage: other devices are mentioned but none of them can be accurately called "topographic." Accordingly, the applicants therefore respectfully submit that LaDue cannot be said to disclose additional communication links connecting additional network devices to such topographic network devices. Accordingly, the applicants respectfully submit that LaDue does not disclose every element recited in Claim 8, and that the rejection of Claim 8 is therefore improper.

Claim 9

The applicants respectfully submit that the rejection of Claim 9 is improper on the grounds that the official action does not set forth a *prima facie* case of anticipation with reference to Claim 9. The rejection of Claim 9 appears to refer to subject matter recited in Claim 10. The official action does not indicate where in the cited reference may be found a disclosure of the subject matter recited in Claim 9.

Claim 10

To advance prosecution of the application, the applicants will assume that the

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rejection of Claim 9 set forth in the official action is intended to refer to Claim 10. The official action states that the subject matter recited in Claim 10 is disclosed by the description of "Dial in direct" at col. 7, lines 1-40 of LaDue's disclosure. The applicants respectfully disagree.

The applicants have been unable to find any reference in the cited passage to a topographic network device as defined in Claim 1 on which Claim 10 depends, i.e., a device whose network address is a topographic coordinate set representing the physical location of the network device. It would have been helpful if the Examiner could have indicated which of the approximately five devices mentioned in the cited passage the Examiner regards as being the topographic network device. The applicants respectfully submit that no topographic network device is disclosed in the cited passage. Moreover, the applicants respectfully point out that Figure 1A to which the cited passage relates is a flow chart, not a block diagram of the network. The applicants have been unable to find anything in the cited passage of LaDue's disclosure that indicates that the devices mentioned therein are directly connected.

Accordingly, the applicants respectfully submit that LaDue does not disclose every element recited Claim 10, and that the rejection of Claim 10 is therefore improper.

Claim 11

The applicants respectfully submit that the rejection of Claim 11 is improper on the grounds that the official action does not set forth a prima facie case of anticipation with reference to Claim 11. The official action states that LaDue discloses the subject matter recited in Claim 11, but does not indicate where in LaDue's disclosure the subject matter recited in Claim 11 may be found.

Claim 12

The official action states that the subject matter recited in claim 12 is disclosed in the description of "dial in direct" at col. 7, lines 1-40 of LaDue's disclosure. Claim 12 refers to topographic network devices. As noted above with reference to Claim 10, the

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applicants respectfully submit that none of the five devices mentioned in the cited passage of LaDue's disclosure can properly be regarded as a topographic network device. Moreover, the applicants have been unable to find anything in the cited passage of LaDue's disclosure that teaches or suggests providing a new destination network address for a message transmitted through a network, the new destination coordinate set being the topographic coordinate set of an output one of the topographic network devices to which the destination network device is connected. Even though LaDue's messages may include location information, LaDue's messages are not addressed using the topographic coordinate set of any network device. Accordingly, the applicants respectfully submit that LaDue does not disclose every element recited Claim 12, and that the rejection of Claim 12 is therefore improper.

Claim 13

The official action states that the subject matter recited in the first paragraph of Claim 13 is disclosed in the description of "routing tables" at col. 10, line 41 et seq. of LaDue's disclosure. The applicants note that LaDue discloses a routing table at col. 10, line 62, but respectfully submit that there is nothing in LaDue's disclosure that teaches or suggests that LaDue's routing table is anything other than a conventional routing table. The applicants therefore respectfully submit that, notwithstanding LaDue's indication that the messages in his network can include location information, LaDue cannot accurately to be said to disclose messages that include the *topographic coordinate set* of a destination network device, i.e., topographic coordinate set of the network device *to which the message is being sent*.

The official action states that the subject matter recited in the second paragraph of Claim 13 is disclosed in the description of a "satellite network" at col. 12, lines 1-67 of LaDue's disclosure. The applicants respectfully disagree. The applicants have been unable to find a teaching of a network divided into regions in the portion of the cited passage in which satellites are mentioned, i.e., between lines 37 and 48. On the contrary, the applicants note that the cited passage states: "The MCMS 106 can transmit a message

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and message request to a serving satellite network controller and the controller simply relays the message to the appropriate satellite and the CCAD-RAAM user receives the message, or command in the same manner as heretofore described.” The applicants respectfully submit that this statement fails to suggest a regionalized network. The applicants respectfully submit that the statement in fact suggests a seamless network, rather than one comprising regions. Accordingly, the applicants respectfully submit that LaDue cannot accurately be said to disclose the subject matter recited in the second paragraph of Claim 13.

The official states that the subject matter recited in the third paragraph of Claim 13 is disclosed in the description of “large area regional pages” at col. 5, lines 1-22 of LaDue’s disclosure. The applicants respectfully disagree. The applicants respectfully submit that LaDue states that the large area pages cited by the Examiner are performed by prior art systems, but are *not* performed by LaDue’s network (“it is no longer necessary to send ... large-area regional pages,” col. 5, lines 15-17). Moreover, the applicants have been unable to find any teaching in the cited passage of a topographic network device that uses topographic information in addition to a topographic address to route a message. Accordingly, the applicants respectfully submit that LaDue cannot accurately be said to disclose the subject matter recited in the third paragraph of Claim 13.

Accordingly, the applicants respectfully submit that LaDue does not disclose every element recited Claim 13 and that the rejection of Claim 13 is therefore improper.

Claim 14

The official action states that the subject matter recited in Claim 14 is disclosed in the description of “additional component parts” at col. 7, lines 1-40 of LaDue’s disclosure. The applicants respectfully disagree. The applicants respectfully note that, while “additional component parts” are mentioned in the cited passage of LaDue’s disclosure, such “additional component parts” are described in the paragraph immediately following the cited passage. It is therefore unclear to the applicants where in LaDue’s disclosure the subject matter of Claim 14 is alleged to be disclosed. The applicants have

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been unable to find anything in the cited passage or the following paragraph of LaDue's disclosure that could accurately be said to disclose the subject matter recited in Claim 14. As noted above, none of the devices that constitute LaDue's network can accurately be said to be a regional network device that stores additional topographic information that such device uses to route a message to a regional network device. Accordingly, the applicants respectfully submit that LaDue does not disclose every element recited in Claim 14 and that the rejection of Claim 14 is therefore improper.

Claim 15

The official action states that the subject matter recited in the first paragraph of Claim 15 is disclosed in the description of "transmitted and received channels" at col. 7, lines 1-40 of LaDue's disclosure. The applicants respectfully disagree. Channels are mentioned in the following contexts in the cited passage: a forward channel carrier [radio] wave, a forward channel carrier wave, a forward analog control channel, a forward digital control channel, and a cell site broad cast [sic] channel. The channels referred to in the cited passage all appear to be allocations of signal bandwidth. The "channels" recited in Claim 15 are physical components of the claimed topographic network device. The applicants have been unable to find anything in the cited passage of LaDue's disclosure that teaches or suggests that any of the channels mentioned therein are "configured for connection via a communication link to another of the topographic network devices," as recited in Claim 15. On the contrary, the applicants respectfully submit that the channels disclosed in the cited passage are communication links. Accordingly, the applicants respectfully submit that LaDue cannot accurately be said to disclose the subject matter recited in the first paragraph of Claim 15.

The official action additionally states that the subject matter recited in the second paragraph of Claim 15 is disclosed in the description of "direct in dial" at col. 7, lines 1-40 of LaDue's disclosure. The applicants respectfully disagree. First, the applicants note that the term "direct in dial" does not appear in the cited passage. The term "dial in direct" is used in the cited passage as an example of a way that the bearer facility

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responds to a packet by sending a command request to MSMS. The applicants have been unable to find anything in the cited passage that could accurately be said to disclose the coordinate store recited in Claim 15, or that topographic coordinate sets of topographic network devices connected to the topographic network device are stored. The applicants have been unable to find anything in the cited passage that teaches or suggest that such communication over normal telephone lines involves a coordinate store in which the topographic coordinate sets of topographic network devices connected to the bearer facility, or that such bearer facility is a topographic network device. Accordingly, the applicants respectfully submit that LaDue cannot accurately be said to disclose the subject matter recited in the second paragraph of Claim 15.

The official action additionally states that the subject matter recited in the second paragraph of Claim 15 is disclosed in the description of "forward the message," at col 12 lines 1-67, et seq. of LaDue's disclosure. The applicants respectfully disagree. At line 61 of the cited passage, LaDue indicates that the MCMS forwards a message received from "the appropriate satellite" to a CCAD-RAAM communicator. However, the applicants have been unable to find anything in the cited passage that could accurately be said to disclose that such forwarding is done by "a topographic processor that operates in response to the connected device coordinate sets stored in the coordinate store and the destination coordinate set of the message," as recited in Claim 15. If such teaching exists in the cited passage, the Examiner is requested to indicate exactly where it may be found. Accordingly, the applicants respectfully submit that LaDue cannot accurately be said to disclose the subject matter recited in the third paragraph of Claim 15.

The official action does not indicate where in the cited reference, the subject matter set forth in the preamble of Claim 15 may be found. The applicants respectfully submit that such subject matter cannot be found in LaDue's disclosure.

Accordingly, the applicants respectfully submit that LaDue does not disclose every element recited Claim 15 and that the rejection of Claim 15 is therefore improper.

The applicants further submit that the rejections of Claims 15-25 that depend on Claim 15 are also improper at least for the reason of these claims' dependency of Claim

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15.

Claim 16

The official action states that the subject matter recited in Claim 16 is disclosed in the description of "routing via the nearest SS7 signal transfer point" at col. 14, lines 16-62 of LaDue's disclosure. The applicants respectfully disagree. The applicants note that lines 40-43 of the cited passage disclose that the CCAD-RAAM data is analyzed, and a routing instruction or acknowledgment signal is sent to the current serving MSC via the nearest SS7 signal transfer point (STP). The applicants have been unable to find anything in the cited passage that can accurately be said to disclose that such routing instruction or acknowledgment signal is sent to a second channel of the MCMS/SCP that is described as performing the above activity. The applicants point out that LaDue indicates that Figure 4 is a flow chart (col. 5, lines 56-57), not a block diagram. Moreover, the applicants have been unable to find anything in the cited passage that can accurately be said to disclose that the "nearest SS7 transfer point" is closer to the current serving MSC than the MCMS/SCP. Accordingly, the applicants respectfully submit that LaDue does not disclose every element recited Claim 16 and that the rejection of Claim 16 is therefore improper.

Claim 17

The applicants respectfully submit that the rejection of Claim 17 is improper on the grounds that the official action does not set forth a prima facie case of anticipation with reference to Claim 17. The official action states that LaDue discloses the subject matter recited in Claim 17, but does not indicate where in the 24 columns and 12 Figures of LaDue's disclosure the subject matter recited in Claim 17 may be found.

Claim 18

The official action states that the subject matter recited in Claim 18 is disclosed in the description of "HRL type service control point" at col. 4, lines 40-67 of LaDue's disclosure. The applicants respectfully disagree. The cited passage describes how a so-

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called "serving system location" of a CCAD communicator is updated every time a CCAD user registers. It appears that such "serving system location" is stored at the MCMS. The "serving system location" appears to represent the identity of the cellular serving area in which the CCAD communicator is currently located, not the physical location of the CCAD communicator itself. The applicants have been unable to find anything in the cited passage that indicates that anything other than such "serving system location" is stored at the MCMS. Accordingly, the applicants have been unable to find anything in the cited passage that can accurately be said to disclose that either device type information or additional topographic information is stored in the MCMS. Moreover, the applicants have been unable to find anything in the cited passage that can accurately be said to disclose a "topographic processor operates in response to the additional topographic information in lieu of the destination coordinate set of the message to identify the second channel," as recited in Claim 18. Accordingly, the applicants respectfully submit that LaDue does not disclose every element recited Claim 18 and that the rejection of Claim 18 is therefore improper.

Claim 19

The official action states that the subject matter recited in the first paragraph of Claim 19 is disclosed in the description of "additional component parts," at col. 7, lines 1-40, of LaDue's disclosure. The applicants respectfully disagree. The applicants note that, while "additional component parts" are mentioned in the cited passage of LaDue's disclosure, such "additional component parts" are described in the paragraph immediately following the cited passage. It is therefore unclear to the applicants where in LaDue's disclosure the subject matter of the first paragraph of Claim 19 is alleged to be disclosed. Moreover, the official action does not indicate which of the 21 "additional component parts" shown in LaDue's Figure 1B and described in the paragraph following the cited passage is regarded as corresponding to a "coordinate store ... additionally configured to store additional topographic information relating to the network," as recited in Claim 19. The applicants have been unable to find anything in the cited passage or the following

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paragraph of LaDue's disclosure that could accurately be said to disclose this subject matter.

The official action additionally states that the subject matter recited in the second paragraph of Claim 19 is disclosed in the description of "monitoring, identifying, specifying communication device," at col. 20, line 47-col. 21, line 17 of LaDue's disclosure. The applicants respectfully disagree. The applicants have been unable to find mention of a "monitoring" operation in the cited passage (LaDue's claim 12), and the relevance of "monitoring" to the subject matter recited in Claim 19 is unclear to the applicants. The applicants have been unable to find anything in the cited passage that could accurately be said to disclose the topographic processor recited in Claim 19. As noted above, the cited passage mentions various structural elements, but none of the mentioned elements could accurately be called "topographic." Moreover, the applicants have been unable to find anything in the cited passage that could accurately be said to disclose that such topographic processor "operates in response to the additional topographic information [stored in a coordinate store] in lieu of the destination coordinate set of the message to identify the second channel [to which the message is routed], as recited in Claim 19.

Accordingly, the applicants respectfully submit that LaDue does not disclose every element recited Claim 19 and that the rejection of Claim 19 is therefore improper.

Claim 20

The official action states that the subject matter recited in Claim 20 is disclosed in the description of "relay" at col. 7, lines 1-40, and "monitoring, identifying, specifying communication device" at col. 20, line 47-col. 21, line 17 of LaDue's disclosure. The applicants respectfully disagree. First, the passage at col. 7, lines 1-40 states "The base site preferably accepts CCAD-RAAM data packet 231, and relays a CCAD-RAAM data packet to mobile switching center MSC 232." The applicants have been unable to find in the above-quoted passage or elsewhere in the cited passage anything that indicates that the "relaying" referred to involves a topographic processor that "operates in response to

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the additional topographic information to identify, as the second channel, a one of the channels connected at least indirectly to one of the communication links at least one of (a) having a higher transmission capacity, and (b) carrying less pre-existing network traffic." The applicants have been unable to find any discussion of capacity or traffic in either of the cited passages. Additionally, the applicants have been unable to find mention of a "monitoring" operation in the cited passage, and the relevance of "monitoring" to the subject matter recited in Claim 20 is unclear to the applicants. Finally, the applicants have been unable to find anything in cited passage at col. 20, line 47-col.21, line 17 that describes an apparatus that performs the "specifying" operation, or that such apparatus comprises channels. Accordingly, the applicants respectfully submit that the "specifying a mobile identification number (MIN) identifying the CMR communications device," cannot accurately be said to disclose a topographic processor that "operates ... to identify, as the second channel, a one of the channels" Accordingly, the applicants respectfully submit that LaDue does not disclose every element recited Claim 20 and that the rejection of Claim 20 is therefore improper.

Claim 21

The official action states that the subject matter recited in the first paragraph of Claim 21 is disclosed in the description of "satellite network," at col. 12, lines 1-67, of LaDue's disclosure. The applicants respectfully disagree. The applicants have been unable to find a teaching of a network including regions, "each of the regions comprising at least one [topographic] regional network device" in the portion of the cited passage in which satellites are mentioned, i.e., between lines 37 and 48. On the contrary, the applicants note that cited passage states: "The MCMS 106 can transmit a message and message request to a serving satellite network controller and the controller simply relays the message to the appropriate satellite and the CCAD-RAAM user receives the message, or command in the same manner as heretofore described." The applicants respectfully submit that this suggests a seamless network, rather than one including regions. Moreover, the applicants have been unable to find any disclosure of topographic regional

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network devices in the cited passage. Accordingly, the applicants respectfully submit that LaDue cannot accurately be said to disclose the subject matter recited in the first paragraph of Claim 21.

The official action additionally states that the subject matter recited in the second paragraph of Claim 21 is disclosed in the description of "monitoring, identifying or specifying communication device," at col. 20, line 47-col. 21, line 17 of LaDue's disclosure. The applicants respectfully disagree. The applicants have been unable to find mention of a "monitoring" operation in the cited passage, and the relevance of "monitoring" to the subject matter recited in Claim 21 is unclear to the applicants. Moreover, the applicants respectfully submit that "specifying a mobile identification number (MIN) identifying the CMR communications device." as recited in the cited passage cannot accurately be said to disclose a topographic processor operating "in response to the additional topographic information to identify as the second channel a one of the channels connected to the regional network device of the region in which the topographic network device is located," as recited in Claim 21. Accordingly, the applicants respectfully submit that LaDue cannot accurately be said to disclose the subject matter recited in the second paragraph of Claim 21.

Accordingly, the applicants respectfully submit that LaDue does not disclose every element recited in Claim 21 and that the rejection of Claim 21 is therefore improper.

Claim 22

The official action states that the subject matter recited in Claim 19 is disclosed in the description of "a converting data," at col. 6, lines 41-58 et seq. of LaDue's disclosure. The applicants respectfully disagree. The cited passage appears to describe a process by which CCAS communicator converts data received from a paging network for transmission in packets that appear as origination packets. The conversion appears to be related to the content of the message, not its addressing. The applicants have been unable to find anything in the cited passage that could accurately be said to indicate that the addressing of the message is changed. The applicants therefore respectfully submit that

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the cited passage cannot accurately be said to describe the topographic translator recited in Claim 22. The applicants have been unable to find anything in the cited passage that operates "in response to the destination network address to provide the topographic coordinate set of another of the topographic network devices as the destination coordinate set for the message." As noted above, LaDue's network does not employ topographic addresses. Nor have the applicants been able to find anything in the cited passage that could accurately be said to disclose the topographic processor recited in Claim 22. Accordingly, the applicants respectfully submit that LaDue does not disclose every element recited Claim 22 and that the rejection of Claim 22 is therefore improper.

Claim 23

The official action states that the subject matter recited in Claim 23 is disclosed in the description of "monitoring, identifying or specifying communication device" at col. 20, line 47-col. 21, line 17 of LaDue's disclosure. The applicants respectfully disagree. The applicants have been unable to find mention of a "monitoring" operation in the cited passage, and the relevance of "monitoring" to the subject matter recited in Claim 23 is unclear to the applicants. The applicants have been unable to find mention of packets or a "packet processing engine" in the cited passage. Nor have the applicants been able to find in the cited passage a description of any other element that "operates to inhibit operation of the topographic translator when it detects a destination coordinate set extant in the received message," as recited in Claim 23. Accordingly, the applicants respectfully submit that LaDue does not disclose every element recited Claim 23 and that the rejection of Claim 23 is therefore improper.

Claim 24

The official action states that the subject matter recited in Claim 24 is disclosed in the description of "monitoring, identifying or specifying communication device" at col. 20, line 47-col. 21, line 17 of LaDue's disclosure. The applicants respectfully disagree. The applicants have been unable to find mention of a "monitoring" operation in the cited

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passage, and the relevance of "monitoring" to the subject matter recited in Claim 24 is unclear to the applicants. The applicants have been unable to find mention of packets or a "packet processing engine" in the cited passage. Nor have the applicants been able to find any other element described in the cited passage that "operates to detect a destination coordinate set in the message and, when it detects the destination coordinate set, to determine whether the destination coordinate set is equal to the topographic coordinate set of the topographic network device," as recited in Claim 24. As noted above, LaDue's network does not employ topographic addresses. Moreover, the specifying disclosed by LaDue specifies the mobile identification number, i.e., a form of serial number, of the CMR communication device. The applicants respectfully submit that a mobile identification number cannot accurately be said to be a topographic network address since it is unrelated to the physical location of the mobile device (see Claim 15 on which Claim 24 depends). Finally, as noted above, the applicants have been unable to find any reference to an apparatus having channels in the cited passage. Accordingly, the applicants respectfully submit that LaDue does not disclose every element recited Claim 24 and that the rejection of Claim 24 is therefore improper.

Claim 25

The official action states that the subject matter recited in Claim 25 is disclosed in the description of "additional component parts" at col. 7, lines 1-40 of LaDue's disclosure. The applicants respectfully disagree. The applicants note that while "additional component parts" are mentioned in the cited passage of LaDue's disclosure such "additional component parts" are described in the paragraph immediately following the cited passage. It is therefore unclear to the applicants where in LaDue's disclosure the subject matter of Claim 25 is alleged to be disclosed. Moreover, the official action does not indicate which of the 21 "additional component parts" shown in LaDue's Figure 1B and described in the paragraph following the cited passage constitutes a packet processing engine. The applicants have been unable to find anything in the cited passage or the following paragraph of LaDue's disclosure that could accurately be said to disclose the

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subject matter recited in Claim 25. The applicants have been unable to find mention of packets or a "packet processing engine" in the cited passage. Nor have the applicants been able to find any other element described in the cited passage that "operates to insert the topographic coordinate set of the topographic network device into the message as a reply-to coordinate set," as recited in Claim 25. As noted above, LaDue's network does not employ topographic addresses. Accordingly, the applicants respectfully submit that LaDue does not disclose every element recited Claim 25 and that the rejection of Claim 25 is therefore improper.

Claims 26-28

The official action states that claims 26-28 contain limitations similar to those set forth in claims 1, 9 and 24 and rejects these claims on the same rationale as claims 1, 9 and 24. The applicants respectfully traverse the rejection of Claims 26-28 on the grounds that the official action does not set forth a *prima facie* case of anticipation with respect to Claims 26-28. The official action does not indicate where in the cited reference may be found a disclosure of the subject matter recited in Claims 26-28. The applicants respectfully submit that none of the rejections of Claims 1, 9 and 24 indicates where in the cited reference may be found a disclosure of "a computer readable medium," a "valid topographic reply-to field" and the process recited in the last two paragraphs of Claim 26. The applicants respectfully submit that none of the rejections of Claims 1, 9 and 24 indicates where in the cited reference may be found a disclosure of the subject matter recited in Claims 27 and 28. Accordingly, the applicants respectfully submit that the rejection of Claims 26-28 is improper.

The applicants further submit that the rejection of Claims 26-28 is improper because LaDue does not disclose every element recited Claims 26-28.

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The applicants respectfully request reconsideration of the rejected claims. The applicants believe that the application is in condition for allowance, and respectfully request such favorable action. If any matters remain outstanding in the application, the Examiner is respectfully invited to telephone the applicants' attorney at (650) 485-3015 so that these matters may be resolved.

Respectfully submitted,
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